

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

PC CONNECTION, INC.,

Plaintiff,

v.

REBECCA WITTS and CLUTCH
SOLUTIONS, LLC,

Defendants.

No. 1:22-cv-00170-SE

**PC CONNECTION, INC. AND CLUTCH SOLUTIONS, LLC'S
JOINT MOTION FOR APPROVAL OF CONSENT ORDER**

Pursuant to Fed. R. Civ. P. (7)(b)(1), Plaintiff PC Connection, Inc. (“Connection”) and Defendant Clutch Solutions, LLC (“Clutch”) hereby respectfully submit this Joint Motion for Approval of Consent Order. As grounds for the motion, Connection and Clutch state as follows:

1. Connection commenced this action on May 13, 2022 against Defendants Rebecca Witts and Clutch Solutions, LLC alleging breach of contract and tortious interference with contractual relations. On June 7, 2022, Connection filed a First Amended Complaint as of right, which is the operative pleading in this matter.
2. Connection’s First Amended Complaint alleges that Defendant Witts breached her restrictive covenant agreement between herself and Connection and Defendant Clutch tortiously interfered with that agreement as Witts’ subsequent employer.
3. As a result of having engaged in settlement negotiations, Connection and Clutch agreed to resolve this action in its entirety as against Clutch and consent to the entry of the attached Proposed Consent Order, attached hereto as Exhibit A. This resolution does not

involve Ms. Witts. The attached Proposed Consent Order reflects the terms of the injunctive relief to which Connection and Clutch have agreed after contemplating the specific facts of the First Amended Complaint.

4. Connection and Clutch request that the Court approve and execute the attached Proposed Consent Order. The Proposed Consent Order conforms to Fed. R. Civ. P. 65(d) in that it states the reason why it is issued, provides specific terms that Connection and Clutch must comply with, and describes in detail the acts restrained and required.
5. The entry of the Proposed Consent Order will resolve this case as between Connection and Clutch and resolves in full Connection's Motion for Expedited Discovery.

Respectfully submitted,

PC CONNECTION, INC.

By its attorneys,

/s/ Samuel H. Martin

Samuel H. Martin (NHBA# 272195)

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AND

CLUTCH SOLUTIONS, LLC

By its attorneys,

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Dated: June 15, 2022

CERTIFICATE OF SERVICE

This hereby certifies that on this 15th day of June, 2022, this document was filed through the ECF system. A copy was sent via ECF to counsel of record for both Defendants.

/s/ Samuel H. Martin
Samuel H. Martin

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